

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*City of Cleveland, et al. v. Purdue Pharma
L.P., et al.*, Case No. 18-OP-45132;

*County of Cuyahoga, et al. v. Purdue
Pharma L.P., et al.*, Case No. 17-OP-
45004;

*County of Summit, et al. v. Purdue
Pharma, L.P. et al.*, Case No. 18-OP-
45090

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**PLAINTIFFS' MOTION FOR LEAVE TO
FILE PLAINTIFFS' OMNIBUS
OPPOSITION TO MANUFACTURER
DEFENDANTS' JOINT OBJECTIONS
AND PHARMACY DEFENDANTS'
OBJECTIONS TO THE SPECIAL
MASTER'S DISCOVERY RULINGS NO.
2 AND 3 UNDER SEAL**

Pursuant to Local Rule 5.2, Plaintiffs seek leave of Court to file Plaintiffs' Omnibus Opposition to Manufacturer Defendants' Joint Objections and Pharmacy Defendants' Objections to the Special Master's Discovery Rulings No. 2 and 3 in the above-listed cases under seal on July 30, 2018.

Plaintiffs' Omnibus Opposition contains references to confidential information contained in documents produced by Defendants marked as "Confidential." Plaintiffs file this Motion and Proposed Order (attached as **Exhibit A**) to ensure compliance with CMO No. 2 (ECF Doc. 441). Plaintiffs will also file a redacted version of Plaintiffs' Omnibus Opposition in the public record.

WHEREFORE, Plaintiffs respectfully request that the Honorable Court grant Plaintiffs' Motion for Leave to File Plaintiffs' Omnibus Opposition to Manufacturer

Defendants' Joint Objections and Pharmacy Defendants' Objections to the Special Master's Discovery Rulings No. 2 and 3 Under Seal.

Dated July 30, 2018

Respectfully submitted,

s/Peter H. Weinberger

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Plaintiffs' Co-Liaison Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of July 2018, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

s/Peter H. Weinberger

Peter H. Weinberger

Plaintiffs' Co-Liaison Counsel